

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
Northern Division**

HEALTHFULEE TOTAL BODY CARE LLC)	
AND)	
STEPHEN D.O. LEE, M.D.,)	
Plaintiffs)	
)	
v.)	Case No. 2:24-cv-533
)	
TOMBIGBEE HEALTHCARE AUTHORITY)	
D/B/A/ WHITFIELD REGIONAL HOSPITAL,)	
Defendant)	

COMPLAINT

Jurisdiction

1. Plaintiff HEALTHFULEE TOTAL BODY CARE LLC is a Tennessee limited liability company domiciled in Tennessee with its principal place of business in Tennessee.
2. Plaintiff STEPHEN D.O. LEE, M.D. is a resident of Tennessee.
3. Defendant is an Alabama healthcare authority, a domestic public corporation.
4. Jurisdiction is proper under 28 U.S.C. §1332, in that it involves citizens of different states and the amount in controversy exceeds \$75,000.

Venue

5. Venue is proper given the parties' agreement. See para. 21. of the Professional Services Agreement attached hereto as Exhibit A.

Factual Allegations

6. On or about October 10, 2023, the parties entered into the agreement set forth in the attached Professional Services Agreement (hereinafter the “Agreement). Exhibit A.
7. Thereafter, Plaintiffs performed the services and other duties and obligations set forth in the Agreement.
8. Defendant has failed to pay the sums due Plaintiffs under said Agreement.
9. The sum due and owing for services rendered and expenses incurred under the Agreement is \$106,182.03, as detailed in the attached timesheets and expense forms submitted to Defendant. Exhibit B.
10. Demand has been made for such sum. See Exhibit C.

COUNT ONE

11. Defendant owes Plaintiffs the sum of \$106,182.03, a sum certain as of August 8, 2024. WHEREFORE, Plaintiffs demand a judgment against Defendant for the sum of \$106,182.03, plus interest and costs.



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